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January 27, 2010

By ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: WC Docket Nos. 08-33 and 08-185.

Dear Ms. Dortch:

The Embarq Companies submit this letter in response to the recent “request to refresh the record” and a “further request for expedited treatment” submitted by Intrado Communications of Virginia, Inc. (“Intrado”) on January 12, 2010.<sup>1</sup> Verizon submitted a letter in response to Intrado’s “request,” filed January 22, 2010. Verizon identifies and corrects important misstatements in Intrado’s submission.

Embarq agrees with Verizon that Intrado has not been prevented from providing competitive 911/E911 services, either in Virginia or elsewhere, by the status of the Commission’s Virginia arbitration. Many months ago, Intrado entered a commercial agreement with Embarq’s affiliate in Florida, and Embarq has proposed entering similar agreements in other states.

Embarq agrees with Verizon that the Ohio commission did not find for Intrado on the threshold issue under consideration here. Indeed, of five state commissions nationwide that have decided this issue, only one has accepted Intrado’s argument that it is entitled to interconnection under Section 251(c) in its business model, and that case is now on appeal.

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<sup>1</sup> Central Telephone Company of Virginia and United Telephone Southeast LLC both adopted the “CenturyLink” d/b/a in late 2009 following the merger of Embarq Corporation and CenturyTel, Inc. In order to maintain consistency throughout this proceeding, however, we will continue to refer to these companies as Embarq.

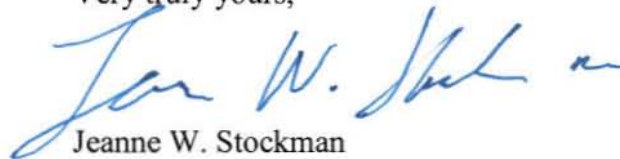
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Embarq also agrees that the present proceeding is limited to addressing an arbitrated interconnection agreement for the Commonwealth of Virginia. In these two consolidated proceedings, the Commission has stepped into the shoes of the Virginia State Corporation Commission for the limited purpose of ruling on the pending arbitration. The arbitration is not a rulemaking or a declaratory ruling, and Intrado should not treat it as such. Even if Intrado's filing were proper, it is inaccurate and replete with assertions irrelevant to the legal issue under Commission review.

Very truly yours,



Jeanne W. Stockman

cc (by Email): Stephanie Weiner  
Christi Shewman  
William Kehoe  
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